

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN DOE 1 and JANE DOE 1, in their
own Capacity and as parents of CHILD
DOE 1, JOHN DOE 2 and JANE DOE 2,
in their own Capacity as parents of CHILD
DOE 2, JANE DOE 3, in her own capacity
and as parent of CHILD DOE 3 on on
behalf of simiarly situated,

Plaintiffs

v.

PERKIOMEN VALLEY SCHOOL
DISTRICT, a Pennsylvania governmental
entity, JASON SAYLOR, MATTHEW
DORR, ROWAN KEENAN, DON
FOUNTAIN, KIM MARES, REENA
KOLAR, SARAH EVANS-BROCKETT,
LAURA WHITE and TAMMY CAMPLI,
all Individual elected offices sued in their
official capacity as members of the
BOARD OF SCHOOL DIRECTORS OF
THE PERKIOMEN VALLEY SCHOOL
DISTRICT, a Pennsylvania elected
legislative body,

Defendants.

CIVIL ACTION NO. 2:22-cv-00287

DEFENDANTS' MOTION TO DISMISS

Defendants the Perkiomen Valley School District (“District”), Jason Saylor, Matthew Dorr, Rowan Keenan, Don Fountain, Kim Mares, Reena Kolar, Sarah Evans-Brockett, Laura White, and Tammy Campli, by and through their attorneys Fox Rothschild LLP, respectfully move before this Court to dismiss Plaintiffs’ First Amended Complaint.

In support of their Motion, Defendants rely upon the contemporaneously filed Brief in Support of Defendants’ Motion to Dismiss.

Respectfully submitted,

FOX ROTHSCHILD LLP

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